

Re: RM-11306

To the Federal Communications Commission:

In general, it is my belief that RM-11306 is a necessary motion that will assist radio amateurs using the currently available modes as well as foster the experimentation, growth, and possibly the permanent implementation of newer modes to be adopted in the future.

Many complain about the digital mode aspect of the proposition. However; as Part 97.221 limits automatically controlled digital stations to certain sections of each the HF bands, there should not be any future problems for operators as long as Part 97.221 remains intact or is replaced with a similar ruling that limits the segment(s) that it is limited to. There also should be no problems arising from what many refer to as semi-automatically controlled stations as this would still require an operator to listen on the chosen frequency of operation to make sure that said frequency is available for use as *should* be done with any mode of operation.

RM-11306, if implemented, allows for segmentation by bandwidth and subsequently the mode of operation. This would be truly beneficial to the amateur radio community as operators would now have secured segments of a each particular band in question to utilize their mode of choice with other amateurs within the same band segment recognizing his/her fellow amateurs necessary bandwidth within the same segment of that particular band. This should help to minimize the “mode wars” that frequently occur between those who favor one mode of operation over another within the same allocated band segment. The unfortunate outcome for many amateurs from the aforementioned “mode wars” is the intentional and unintentional interference due to the lack of respect for “the other guy” and/or the lack of understanding of the terms “occupied” and “necessary” bandwidth as defined for a particular mode of operation. The best example of this to be seen that I know of is in the 75 meter phone band in the area which is generally known as the “AM window”. This area, to the best of my knowledge, has existed for many years between 3.870MHz and 3.890MHz as a “gentleman’s agreement” for AM phone operation so as not to have arguments pertaining to occupied bandwidth and/or residual “splatter”. What used to be known as the “AM window” in this example has become so undesirable for use due to mutual interference between AM and SSB operators. I will state with certainty that there are many more examples of this type throughout the complete amateur radio spectrum. For some reason respect is still maintained in the “gentleman’s agreement” of the “DX window” between 3.790MHz and 3.800MHz.

The downfall of RM-11306 if implemented is that a restructuring will need to take place with regard to license class and the segments of the amateur bands that each license class holder may operate within. I will make myself clear by stating that it would be unfair if any licensees obtained an unequal loss or gain of useable spectrum with regard to what each licensee is currently privileged to use. All license classes will need to be considered including the Novice, Technician Plus, and Advanced classes as they are still valid under the grandfather clause. This may be difficult to resolve, but not impossible.

My conclusion is as follows. If amateur radio operators can not resolve certain issues on their own as they should be able to, then we do need some form of intervention to

tell us what to do with regard to formal and written law. “Mommy needs to tell baby where to play and with who”. Although RM-11306 is not flawless, it is a step in the right direction to the correction of the many downsides that amateur radio is being currently presented with.

Yours Truly,
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